

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,

Case No: 22-cr-00237 (NEB/TNL)

Plaintiff,

v.

Bekam Addissu Merdassa,

Defendant.

**DEFENDANT'S MOTION TO
ALLOW TRAVEL**

Defendant Bekam Addissu Merdassa, by and through counsel, respectfully moves the Court for an order granting permission for him to reside temporarily in Addis Ababa, Ethiopia pending sentencing.

As the Court knows, Mr. Merdassa pleaded guilty to a one-count felony information and awaits sentencing. Given the broader case that is currently being prosecuted, it is not expected that Mr. Merdassa will be sentenced anytime soon. Once he was charged, Mr. Merdassa notified his employer of the charge, and Mr. Merdassa was immediately terminated. Since then, despite his best efforts, Mr. Merdassa has been unable to obtain employment appropriate for his educational level. Based on information available to him, Mr. Merdassa believes that his employment opportunities are significantly better in Ethiopia. Accordingly, pending his sentencing, Mr. Merdassa seeks permission to reside in Ethiopia so that he may be gainfully employed.

Mr. Merdassa continues to have family members who reside in Minnesota, including his parents, who have no intention of leaving the state. In addition,

Mr. Merdassa has repeatedly demonstrated his willingness to return to the United States to face the consequences of his criminal conduct.

Defense counsel has conferred with both the U.S. Attorney's Office and the Probation Officers regarding this request, and they have no objection. The Probation Office has advised the undersigned that they cannot supervise Mr. Merdassa if he lives outside the United States, and accordingly, we also ask that the condition of his supervision by the Probation Office also be released during the time that he is residing outside the country.

Mr. Merdassa agrees to maintain contact with his counsel and to return to the country for sentencing or as otherwise needed or ordered by the Court.

Respectfully submitted,

Dated: March 23, 2023

/s/ Joseph T. Dixon

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